

**ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA-002088-5**

I. GENERAL INFORMATION

**TOWN OF WINTHROP
PO BOX 459
WINTHROP, WA 98862**

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on December 30, 2003, and accepted by the Department on January 12, 2003. Prior to making a determination whether to reauthorize an existing permit or conduct a full renewal, a thorough review of the permit and compliance history of the facility is conducted. This review shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for the Town of Winthrop POTW and discharge monitoring reports (DMRs) were reviewed and they indicate no change in the treatment characteristics of the effluent process or increases in volume of wastewater have occurred.

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III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to the Town of Winthrop POTW for the discharge of wastewater to the Methow River, at River Mile: 49. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The fact sheet and application lists no existing or proposed industrial users of the POTW.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet adequately addressed conditions and issues at the facility at the time when the previous permit was issued. The Department has not received any information during the course of the previous permit term indicating environmental impacts from the discharge were overlooked. Nor have incidents severe enough to undertake a complete renewal of the permit occurred during that time period.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year permit.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

There are no changes necessary to the previous permit conditions based on the data contained in following tables. The Permittee will be required to continue with routine I & I and Wasteload Assessments during the course of the next permit.

Table 1 compares the influent characterization as reported this permit term to the Design Criteria.

Table 1
Influent Characterization Compared to
POTW Design Criteria

Parameter	Units	Cumulative Monthly Average ¹		Cumulative Maximum Average Monthly ² .	
		Current Value Nov. 2002-03	% of Design	Current Value Nov. 2001-03	% of Design
BOD ₅	mg/L	197.1	NA	266 ³	NA
BOD ₅	lb./Day	100	19.5	197 ⁴	38.4
Flow	MGD	0.027	9	0.049	16.3
Temperature	°C	14.3	NA	15.2	NA
TSS	mg/L	162.2	NA	250 ⁵	NA
TSS	lb/Day	72.1	14	150 ⁶	29.2

NA means Not Applicable

¹ Monthly average value based on a one year time frame from November 2002 to November 2003.

² Maximum Monthly Average taken from DMRs from November 2001 to November 2003.

³ Highest value occurred in November 2001.

⁴ Highest values occurred in July and November of 2001.

⁵ Highest value occurred in September 2003.

⁶ Highest value occurred in August 2003.

Table 2 contains a direct comparison of the effluent parameters reported this current permit term, November 2001 to November 2003, with the previous five year permit term (1993-1998).

Table 2
Effluent Characterization Compared to Permit Limits
and Past Effluent

Parameter	Units	2 Year Cumulative Monthly Average			Average Monthly Maximum/Minimum		
		Current Value ¹	Last Permit Cycle ²	% of Permit Limit	Current Value ¹	Last Permit Cycle ²	% of Permit Limit
BOD₅	mg/L	13.6	24	45.3	30 (Max) ³	45 (Max)	100
BOD₅	lb./Day	3.4	9.6	4.8	12.1 (Max)	50 (Max)	17.3
BOD₅ % Removal	lb./Day	93.1	88.5	NA	83 (Min)	79 (Min)	NA
DO	mg/L	9.4	8.5	NA	2.02 (Min)	1.3 (Min)	NA
Residual Chlorine	lb./Day	0.01	0.08	3.3	0.02 (Max)	0.26	86.7
Fecal Coliform Bacteria	# colonies per 100 ml	5	N/A ⁴	2.5	89 (Max)	8 (Max)	44.5
Ph	Std. Units	NA	NA	NA	9.34 (Max) ⁵ 5.71 (Min) ⁵	7.97 (Max) 7.06 (Min)	NA
TSS	mg/L	14.1	28	25.2	39 (Max)	64 (Max)	69.6
TSS	lb./Day	3.1	11.8	2.2	8.4 (Max)	33 (Max)	6

NA means Not Applicable

¹ Time frame analyzed is from November 2003 to November 2001.

² Time frame analyzed is from August 1997 to July 1998.

³ BOD₅ occurring August 2002.

⁴ An accurate annual average could not be determined due to the large number of fecal counts of less than one.

⁵ One maximum pH violation occurring May 2003 and one minimum pH violation occurring in September 2002.

The Permittee has been in substantial compliance with the permit requirements in recent years. The Permittee has received violations for exceedances listed in the above table footnotes and a handful prior to 2001. The Permittee received a Notice of Violation, DE 00WQR-1794 dated November 17th 2000 for failure to submit DMRs from January 2000 through October 2000. A memo from the Permittee stated a work place injury requiring an extended leave of absence of a key employee as the reason for late DMR submittals. Monitoring and record keeping were maintained during that time frame. The oversight

has been corrected and all DMRs have since been submitted. The previous permit required an update to the O & M Manual, which is currently in the review process at the Department. The Department feels that the violations that have occurred are minor or have been corrected during the existing permit cycle and therefore does not warrant a complete rewrite of the permit.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A - Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B - Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be reauthorized for five years.

APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on July 16, 2003 in the Wenatchee World to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft Reauthorization (PNOD) on March 11, 2004 in the Methow Valley News to inform the public that a draft reauthorization permit, fact sheet addendum, and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below.

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, WA 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (509) 457-7105, or by writing to the address listed above.

This Addendum to the fact sheet and the proposed permit were written by Richard Marcley.

APPENDIX B -- RESPONSE TO COMMENTS

No comments were received by the Department of Ecology.